

November 8, 2010
Audubon Maryland-DC
2901 East Baltimore Street
Baltimore, MD 21224

The Honorable Lisa P. Jackson
Administrator
U. S. Environmental Protection Agency
Water Docket, Mailcode: 28221T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Transmitted by e mail
RE: Chesapeake Bay TMDL -- Docket no. EPA-R03-OW-2010-0736

Dear Administrator Jackson:

Thank you for the opportunity to comment on Environmental Protection Agency's (EPA) proposed Total Maximum Daily Load (TMDL) for Chesapeake Bay. This letter indicates the strong support of Audubon Maryland-DC for the immediate promulgation of the TMDL. Audubon Maryland-DC is one of 21 state programs of the National Audubon Society, with over 7,000 individual members, and 4,800 chapter members state-wide. These comments are presented on their behalf.

Audubon Maryland-DC's mission is to conserve, restore, and sustain the natural ecosystems of Maryland and the District of Columbia, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the Earth's biological diversity. The ongoing decline of water quality in Chesapeake Bay continues to exact adverse impacts on wildlife and human communities dependent on healthy ecosystems for survival and well-being.

The US Geological Survey's Findings of the Chesapeake Bay Program's Chesapeake Bay Program's Chesapeake 2000 Goal for Living Resources <http://pubs.usgs.gov/circ/circ1316/html/circ1316chap1.html#tableliving> is one of many documents that indicate the adverse impacts the Bay's water quality is exacting on birds and other wildlife. Of the 38 Important Bird Area's (IBA) that Audubon has designated for Maryland, 33 are in the Bay watershed. Land use compatible with wildlife habitat protection in these IBA's is the same land use that will accrue positive impacts to improving Bay water quality, assuming that good information, political will and accountability is in place to facilitate these decisions. The proposed TMDL is an essential enhancement to accountability that has been absent in the past. It

is imperative to promulgate the TMDL as a key tool necessary to effectively restore and protect the Bay, and an attempt to mitigate failed measures, tools and options from the past.

We compliment the work of the Environmental Protection Agency and note the ongoing technical support, financial guidance and scientific data being offered to all Bay states and the District of Columbia, to ensure compliance and on-the-ground progress to meet the goals of the TMDL. As a science-based biodiversity protection organization, Audubon further acknowledges the Chesapeake Bay Program's significant investments over the last 25 years to developing some of the most sophisticated and scientifically sound ecosystem models in the world.

In closing, Audubon further incorporates the extensive comments of the Choose Clean Water coalition, of which we are a member.

Sincerely,

Jacquelyn Bonomo
Executive Director and Vice President